



Grower-Shipper Association of Central California
“OUR MEMBERS: PARTNERS PRODUCING PROSPERITY”

January 21, 2019

Chairman Jean-Pierre Wolff
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Re: Notice of Written Public Comment Period for Ag Order 4.0 Conceptual Regulatory Requirement Options

Dear Chairman Wolff,

The Grower-Shipper Association is a trade association that includes growers, shippers and processors of vegetables, strawberries, mushrooms, wine grapes and more crops operating in Monterey, Santa Cruz, San Benito and Santa Clara Counties. Since 1930, we have worked diligently to represent our members' needs, and finding solutions around water quality has been a top priority to our members for many years. Today we work on behalf of more than 350 members operating within the four counties listed above.

Separately, you will find a joint letter signed by GSA and other partners in agriculture. This letter and its attachments are in response to your request for alternative options as well as examples of quantifiable milestones different from the suggestions staff has brought forward. Over the past year our organization and Monterey County Farm Bureau have jointly held meetings of a Technical Advisory Committee made up of farmers and their advisors to identify methodologies to address water quality priorities and propose methods to show demonstrated improvement. On average, this group meets every other week and discusses on-the-ground solutions, ideas, and challenges. Since last spring the group has been dedicated to identifying solutions related to the Central Coast Regional Water Quality Control Board's (Regional Board) Irrigated Lands Program. Our trade association partners held meetings with staff to help us understand what might be incorporated into their staff proposal's matrix of options well in advance of your November meeting and discuss ideas. Unfortunately, these options tables are not reflective of the ideas brought forward by agriculture in these discussions. We were encouraged by staff to bring forward our alternative ideas, and therefore submitted an overarching concept proposal on October 8, in advance of the staff proposal release, that was meant to lead to further conversation and the building of productive compliance options while balancing the importance of sustaining agriculture on the Central Coast.

Once the staff proposal was released, we were disappointed to see that numeric limits were being referred to as the preferred quantifiable milestones in the report. We go into great detail in our joint letter about why these are not required by Non-Point Source policy, nor the East San Joaquin order, and we provide more suitable quantifiable milestones to non-point source

regulation. We are concerned that the options tables are punitive by suggesting enforcement of numeric limits instead of quantifiable milestones that allow for a management practice-based iterative approach with incentives for new technologies, innovative ideas and collaborative, collective action. We are also concerned that the staff report shows no demonstration within the options tables of the need and usefulness of much the data suggested to be reported, much of which will be very expensive to collect, and how it will contribute to an improvement in water quality. We were disheartened to see the various individual monitoring requirements proposed, many of which are impractical and come with a significant financial burden and little clarity about the usefulness of the information. We are also deeply concerned with proposed limitations or prohibitions on the application of fertilizers and pesticides and detail that concern as well as question its legality in our joint letter.

When I presented our proposal to you in November 2018, I clearly heard that you wanted to understand what alternate quantifiable milestones agriculture might bring forward. You will find those detailed in this joint proposal. These include, but aren't limited to: ranch scores provided by Regional Board inspections, and the implementation/installation of management practices that are expected to prevent irrigation return flows from leaving the farm/ranch; decreasing the percentage of farms/ranches with low scores; having certain percentages of farms/ranches implement and/or install management practices that prevent irrigation flow from leaving a farm/ranch within so many years of order adoption; having priority watersheds that are primarily impacted by agricultural discharges demonstrate water quality improvements over time; a decrease in the number of outliers over time as identified by the Regional Board; development of a Central Coast specific INMP Summary Report Template and a sediment and Erosion Plan Template; as well as milestones tied to completion of educational requirements.

We also recommend that certain tasks related to education, templates, and methodologies be conducted by an agricultural third-party group. This group has significant potential to work with staff, influence more clarity in the conversation around solutions, and be a resource to growers.

This proposal is an outgrowth of our October concept proposal, and provides additional detail that I believe you will find compelling. It also illustrates a strong effort by agriculture to bring forward quantifiable milestones in a way that allows for incentivization of practice adoption to improve on-farm practices in prioritized areas through careful consideration of risk and potential to influence water quality.

For more than a decade, we have implored the Regional Board to consider agriculture's ideas. We heard from you that you need to see quantitative milestones and we've worked hard to bring those forward. We ask the Regional Board to set aside their focus on their current matrix and use this proposal as the basis for a productive alternative that will focus on improvement in Central Coast watersheds while supporting a continued viable agricultural community.

Sincerely,



Abby Taylor-Silva
Vice President, Policy & Communications
Grower-Shipper Association of Central California